

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF STEARNS

SEVENTH JUDICIAL DISTRICT
Case Type: Personal Injury

Heidi Klever,

Judge: _____

Court File No.: _____

Plaintiff,

vs.

COMPLAINT

United States Postal Service
and Alan Bryan Ringwelski,

Defendant.

1. On May 13, 2017, Defendant, Alan Bryan Ringwelski, was working, delivering mail, as an employee of defendant United State Postal Service [USPS] and driving a van owned by USPS. As Ringwelski was delivering mail on 5.13.2017, on 5th Street North a short distance east of the intersection of 5th Street North and 5th Avenue North in the City of Sartell, Stearns County, Minnesota, Ringwelski made a U-turn to change from traveling eastward to traveling westward on 5th Street North.

2. When Ringwelski made his U-turn he turned directly in front of plaintiff Heidi Klever; Klever was driving her 2015 Chevy Malibu eastward on 5th Street and was unable to avoid colliding with Ringwelski when Ringwelski turned in front of her.

3. At the time of the collision between Ringwelski and Klever on 5.13.2017, Ringwelski was negligent, meaning that Ringwelski failed to use reasonable care in driving the USPS van. Specifically, Ringwelski was negligent in failing to keep a proper lookout and in failing to yield the right-of-way.

EXHIBIT

2

4. Ringwelski's negligence was a direct cause of the collision between Klever and Ringwelski on 5.13.2017.

5. At the time of the collision on 5.13.2017, Ringwelski was acting in the course and scope of his employment with the USPS so the USPS is vicariously responsible for Ringwelski's driving conduct on 5.13.2017 and the USPS is vicariously responsible for Klever's damages as a result of the 5.13.2017 collision.

6. As a direct result of the crash between Ringwelski and Klever on 5.13.2017, Klever was seriously and permanently injured and Klever sustained damages in the form of past and future medical expenses and a past wage loss and a future loss of earning capacity; and Klever suffered in the past and will likely suffer in the future pain, disability and emotional distress.

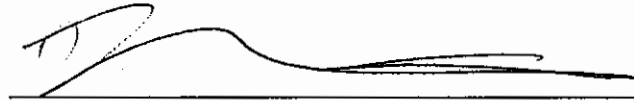
7. Also as a direct result of the 5.13.2017 crash, Klever's Chevy Malibu was damaged; it cost \$6,896.25 to repair the Malibu and it cost \$664.16 for a rental car while the Malibu was being repaired.

WHEREFORE, plaintiff Heidi Klever demands judgment against defendants Alan Bryan Ringwelski and United States Postal Service [USPS] for property damage in the amount of \$7,560.41 and for personal injury damages in excess of fifty thousand dollars [\$50,000] and for interest, costs, and disbursements as allowed by Minnesota law.

The undersigned hereby acknowledges that
sanctions may be imposed under Minn. Stat. § 549.211.

BRADSHAW & BRYANT, PLLC

Dated: 3/25/19



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